

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
)	
W. R. GRACE & CO., <u>et al.</u> , ¹)	Case No. 01-1139 (JJF)
)	Jointly Administered
Debtors.)	

Objection Deadline: October 10, 2001 at 4:00 p.m.

CERTIFICATION OF COUNSEL RE: DOCKET NO. 957

1. The undersigned hereby certifies that, as of the date hereof, he has received no answer, objection or other responsive pleading to the *Debtors' Application for the Entry of an Order Approving and Authorizing the Retention of Rust Consulting, Inc. as the Official Claims Handling Agent* (the "Application") (Docket No. 957). The undersigned further

¹ The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc.), Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

certifies that he has reviewed the Court's docket in these cases, and no answer, objection or other responsive pleading to the Application appears thereon. Pursuant to the Notice, objections and responses to the Application were to be filed with Court and served on counsel for the Debtors on or before October 10, 2001.

2. The Office of the United States Trustee (the "UST") did, however, request that certain language be added to the proposed form of order granting the Application. In response to the UST's comments, the Debtors, with the consent of Rust Consulting, Inc. ("Rust"), have revised the proposed form of order to add the following language: "notwithstanding anything to the contrary set forth in the Claims Services Agreement, Rust will not cease providing services to the Debtors without obtaining the prior approval and authority from the Court to cease such services." The UST has approved the form of the revised order, as the added language has addressed the UST's concerns regarding the retention of Rust. The revised order is attached hereto as Exhibit A.

3. Accordingly, the Debtors respectfully request that the Court enter the revised order attached hereto at the Court's earliest convenience.

Dated: October 16, 2001

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